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*Attorneys for Defendants*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PENDLETON DIVISION**

WESTERN WATERSHEDS PROJECT,  
et al.,

Plaintiffs,

v.

SECRETARY OF THE UNITED STATES  
DEPARTMENT OF THE INTERIOR,  
and BUREAU OF LAND MANAGEMENT,

Defendants.

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Case No. 2:21-cv-297-HL

**JOINT MOTION FOR EXTENSION  
OF TIME TO FILE OBJECTIONS TO  
FINDINGS AND RECOMMENDATION**

**EXPEDITED CONSIDERATION AND  
DECISION REQUESTED**

Plaintiffs Western Watersheds Project, Oregon Natural Desert Association, WildEarth Guardians, and Center for Biological Diversity, and Defendants Secretary of the United States Department of the Interior and Bureau of Land Management, jointly move for an extension—until Tuesday, December 13, 2022—of the deadline to file Objections to the Findings and Recommendation (“F&R”) issued on November 8, 2022 (ECF No. 38). The current deadline is November 22, 2022. 28 U.S.C. § 636(b)(1)(C).

Good cause exists for the requested extension. The counsel for plaintiffs since the outset of this case, Ms. Brooks and Mr. Lacy, both began leaves of absence last week which will last until at least mid-January. Undersigned counsel for plaintiffs was retained late last week to serve as co-counsel in this case during their absence, and needs time to come up to speed and complete consultation with plaintiffs regarding how they wish to proceed in responding to the F&R. Because of absences among the plaintiff group associated with the upcoming Thanksgiving holidays, it is not certain that such consultations can be completed before the holidays. Undersigned counsel will also be traveling during the Thanksgiving holidays and has conflicting deadlines immediately before and after in other matters. Therefore, plaintiffs respectfully request that the Court extend the deadline for filing Objections to the F&R until December 13, 2022.

Defendants concur in this request. The current deadline conflicts with various agency personnel’s leave and the agency needs additional time to determine how it would like to respond to the F&R. Additionally, defendants need the extra time because one of their counsel, Ms. Carroll, is on parental leave, and undersigned counsel for defendants has conflicting obligations in other cases.

Because the F&R relate to a motion to dismiss and no further deadlines have been set in this case, the requested extension will not impact any other deadlines or schedules in this case.

DATED this 15th day of November 2022.

Respectfully Submitted,

s/ David H. Becker  
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